

rehabilitation, tenant location, and property management of the Rental Properties it convinces its investors, including the Plaintiffs, to purchase.

33. Although Defendants now claim that they had no involvement with Oceanpointe and the other entities listed above, that's not what they told investors, including Plaintiffs:

On Thursday, June 29, 2017, 4:25 AM, Clayton Morris <clayton@morrisinvest.com> wrote:

Yes sir we have many LLC's that we use to hold our acquisitions before rehab. And that is just one of them we own.

From: [REDACTED]
Date: June 28, 2017 at 7:31:05 PM
To: Clayton Morris <clayton@morrisinvest.com>
Subject: Re: Earlier bird

Just wondering, are you the owner of Oceanpoint holdings as well or is that a separate company that you just work with to manage the properties that you sell to investors like me?

34. Defendants persuaded hundreds of investors to purchase Rental Properties in Marion County during 2017 and 2018.

35. Defendants did not evaluate whether their investors were sophisticated, accredited, or otherwise had any particular financial acumen or experience in real estate investing. Instead, they appear to have targeted inexperienced investors, many of whom ultimately lost large proportions of their savings or retirement funds in the scheme.

36. For its part, and in accordance with its partnership with Morris Invest and Clayton Morris, Oceanpointe, Indy Jax Wealth Holdings, LLC, and/or Indy Jax Properties, LLC purchased hundreds of homes in the Indianapolis area. Many of these homes came from tax sales.